

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF VIRGINIA
Harrisonburg Division

ZACHARY CRUZ, ET. AL.,

Plaintiffs

v.

DUANE LEE CHAPMAN, ET. AL.,

Defendants.

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Case No. 5:21-cv-00072

CHAPMAN MOTION TO DISMISS

Come now Defendants Duane Lee Chapman and Lyssa Chapman, by
counsel, and move to dismiss:

1. For lack of personal jurisdiction pursuant to Federal Rules of Civil
Procedure 4(k)(1)(a) and 12(b)(2).
2. For using a false or fictitious name in violation of Rule 12(b)(1).
3. For failure to state a claim upon which relief may be granted pursuant
to Rule 12(b)(6).
4. The grounds for this motion are set forth more fully in the
accompanying brief filed with this motion.

DATED: November 29, 2021

Respectfully submitted,

DUANE LEE CHAPMAN
LYSSA CHAPMAN
By counsel

/s/ Bradley G. Pollack /s/
Bradley G. Pollack
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Certificate of Service

I hereby certify that on the 29th day of November 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system which will cause service upon all interested parties. I will then email the document and a notification of such filing (NEF) to Defendant Briggman via electronic mail, which email address is briggman@gmail.com.

/s/ Bradley G. Pollack /s/
Bradley G. Pollack